

David H. Cox, Esquire (VSB # 19613)
dcox@jackscamp.com
John Matteo, Esquire (VSB # 35054)
jmatteo@jackscamp.com
1120 Twentieth Street, N.W.
South Tower
Washington, D.C. 20036-3437
(202) 457-1600 – telephone
(202) 457-1678 – facsimile

Hearing: March 30, 2009 at 10:00 a.m.
Objections Due: March 26, 2009 at 4:00 p.m.

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)
CIRCUIT CITY STORES, INC., et al.,) Chapter 11
Debtors,) Case No. 08-35653-KRH
) (Jointly Administered)
)
)
)
)

**NOTICE OF MOTION
AND NOTICE OF HEARING**

PLEASE TAKE NOTICE that 610 & San Felipe, Inc. (the “Landlord”) has filed its *Motion of 610 & San Felipe, Inc. for an Order Compelling Debtor to Immediately Pay Post-Petition Rent and Other Related Charges Pursuant to 11 U.S.C. § 365(d)(3) and Granting Related Relief* (the “Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the Court to grant the relief sought, you must do the following:

1. You must file with the Court a written response to the Motion pursuant to Local Bankruptcy Rule 9013-1 no later than **March 26, 2009**. The Court is located at:

Clerk of the Court
United States Bankruptcy
Court 701 East Broad Street
4th Floor
Richmond, Virginia 23219

2. You must also mail a copy to the following persons:

David H. Cox, Esquire
Jackson & Campbell, P.C.
1120 Twentieth Street, N.W.
South Tower
Washington, D.C. 20036

Robert B. Van Arsdale, Esq.
Office of the U.S. Trustee
701 East Broad Street, 4th
Floor Richmond, Virginia
23219

3. You must also attend the hearing to consider the relief sought in the Motion in addition to filing a written response. If you fail to file timely a written response and to attend the hearing, the Court may consider any objection you may have waived and enter an Order granting the relief requested. The hearing is scheduled for **March 30, 2009 at 10:00 a.m.**, at the United States Bankruptcy Court, 701 East Broad Street, Court Room 5000, Richmond, Virginia 23219.

610 & SAN FELIPE, INC.

March 16, 2009

By: /s/ David H. Cox **Counsel**

David H. Cox, Esquire (VSB # 19613)

dcox@jackscamp.com

John Matteo, Esquire (VSB # 35054)

jmatteo@jackscamp.com

JACKSON & CAMPBELL, P.C.

1120 Twentieth Street, N.W.

South Tower

Washington, D.C. 20036-3437

(202) 457-1600 – telephone

(202) 457-1678 – facsimile

Attorneys for 610 & San Felipe, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Motion and Notice of Hearing has been served on the parties receiving electronic notice via the Court's CM/ECF system, as appropriate, by electronic means and by First Class Mail (postage prepaid) on the following attached Service List and on the following parties via US regular mail, on this the 16th day of March, 2009.

Circuit City Stores, Inc.
Attn: Reginald D. Hedgebeth
Attn: Daniel W. Ramsey
9950 Maryland Drive
Richmond, Virginia 23233

Debtors

Daniel F. Blanks, Esquire
Douglas M. Foley, Esquire
McGuire Woods LLP
9000 World Trade Center
101 West Main Street
Norfolk, Virginia 23510

Counsel for the Debtors

Dion W. Hayes, Esquire
James S. Sheerin, Esquire
Sarah Beckett Boehm, Esquire
McGuire Woods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219

Counsel for the Debtors

Gregg Galardi, Esquire
Ian S. Fredericks, Esquire
Skadden Arps, Slate Meagher & Flom, LLP
One Rodney Square
Box 636
Wilmington, Delaware 19899

Counsel for the Debtors

Chris L. Dickerson, Esquire
Skadden Arps, Slate Meagher & Flom, LLP
333 West Wacker Drive
Chicago, Illinois 60606

Counsel for the Debtors

Robert B. Van Arsdale, Esquire
Office of the U. S. Trustee
701 East Broad Street
Suite 4304
Richmond, Virginia 23219

*Office of the United States Trustee for
the Eastern District of Virginia, Richmond Division*

Linda K. Myers, Esquire
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, Illinois 60601

Special Counsel for Debtors

David S. Berman, Esquire
Riener & Braunstein LLP
Three Center Plaza
Sixth Floor
Boston, Massachusetts 02108

Counsel for Bank of America, N.A.

Bruce Matson, Esquire
LeClair Ryan
Riverfront Plaza, East Tower
951 East Byrd Street
Eighth Floor
Richmond, Virginia 23219

Counsel for Bank of America, N.A.

Lynn L. Tavenner, Esquire
Tavenner & Beran, PLC
20 North Eighth Street
Second Floor
Richmond, Virginia 23219

*Counsel for the Official Committee of
Unsecured Creditors*

Robert J. Feinstein, Esquire
Jeffrey N. Pomerantz, Esquire
Pachulski Stang Ziehl & Jones LLP
780 Third Avenue
Twenty-Sixth Floor
New York, New York 10017

Counsel for the Creditors Committee

By: /s/ David H. Cox